

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

IN RE:

Sarah M. Siebert
Bernard J. Siebert
Debtor(s)

§
§
§ CASE NO. 15-06624
§ HON. Scott W Dales
§
§

MOTION TO CONVERT CASE TO CHAPTER 7

NOW COME Debtor(s), Sarah M. & Bernard J. Siebert, through counsel and hereby move to convert their case from Chapter 13 to Chapter 7 pursuant to 11 USC §1307, and in support of their motion state as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
2. Debtor(s) filed for bankruptcy protection under Chapter 13 of Title 11, United States Code ("the Code"), on 12/04/2015, and the Plan was subsequently confirmed on 2/18/2016.
3. Since the filing of the bankruptcy petition, the Debtors have separated and are seeking a divorce.
4. The Debtors have each established a separate residence and do not live together.
5. The Debtors does not intend to reconcile and believe that the divorce will be final within the next few months.
6. Since the Debtors have now had to establish two separate households they do not have sufficient disposable income to complete their Chapter 13 plan and they wish to convert their case to Chapter 7 in accordance with 11 U.S.C. §1307(a).
7. The conversion to a Chapter 7 is proposed in good faith.

WHEREFORE, Debtors request this Court issue its Order converting this case under Chapter 13 to Chapter 7 under the Bankruptcy Code.

Dated: 4/11/2019

/s/
Sarah M. Siebert, Debtor

Dated: 4/11/2019

/s/
Bernard J. Siebert, Debtor

Dated: 4/11/2019

/s/

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